

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 FEB 13 AM 11:04



RECEIVED

2013 FEB 11 PM 2:59

FEC MAIL CENTER

February 8, 2013

MUR # 6721

Anthony Herman  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

Re: Request for Investigation of Beth Steele and Women Advocating Respect for Failing to Report an Independent Expenditure

Dear Mr. Herman:

Pursuant to 2 U.S.C. § 437g(a)(1), I hereby request that the Federal Election Commission initiate an investigation of Beth Steele and Women Advocating Respect for failing to report an independent expenditure expressly advocating the defeat of a candidate for federal office in violation of 2 U.S.C. § 434(c)&(g) and 11 C.F.R. § 109.10.

On or about October 25, 2012, voters in the Ninth Congressional District of Florida received the following automated telephone message ("robocall") from Beth Steele and Women Advocating Respect:

"Hi, I'm Beth with Women Advocating Respect.

On behalf of the women of Central Florida, I want you to know this about multi-millionaire congressional candidate Alan Grayson.

This is the same Alan Grayson who called Dan Webster 'Taliban Dan' simply for being a Christian.

His TV and radio ads against Todd Long are absolutely false.

His distortions to attempt to scare our Seniors are despicable.

This is the same Alan Grayson already thrown out of Congress once for his repeated lies and outrageous comments.

Now he is being sued for millions of dollars for taxpayer fraud.

On November 6, send Alan Grayson home for good.

Paid for by Women Advocating Respect."

OFFICE OF THE  
GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION  
2013 FEB 12 PM 1:05

180044420001

A computer disk containing the audio of the Women Advocating Respect robocall is attached as Exhibit A.

On information and belief, Beth Steele was the narrator of the Women Advocating Respect robocall and the girlfriend of Todd Long, the Republican candidate running against Alan Grayson in 2012 to represent the Ninth Congressional District of Florida in the U.S. House of Representatives. The Todd Long campaign reported receiving \$2,399.05 in in-kind contributions from Ms. Steele for the 2012 general election. See Todd Long for Congress, October 15<sup>th</sup> Quarterly Report at 18-19 (filed October 1, 2012 and attached as Exhibit B).

No organization named Women Advocating Respect has filed a Statement of Organization with the Federal Election Commission. No organization by that name is registered as a political committee with the Florida Secretary of State's Division of Elections or as a business entity with the Florida Secretary of State's Division of Corporations. As far as we have been able to determine, Women Advocating Respect is merely the alter ego of Beth Steele.

Neither Beth Steele nor Women Advocating Respect filed a report with the Federal Election Commission disclosing an independent expenditure in the form of a robocall expressly advocating the defeat of Alan Grayson as required by 2 U.S.C. § 434(c)&(g) and 11 C.F.R. § 109.10.

As you know, the Federal Election Campaign Act requires any individual person who makes an independent expenditure of more than \$250 in a calendar year to file a report with the Commission. 2 U.S.C. § 434(c)(1); 11 C.F.R. § 109.10(b). Moreover, any person that makes or contracts to make an independent expenditure aggregating \$1,000 within 20 days (but less than 24 hours) before an election must file a report with the Commission within 24 hours after the independent expenditure is disseminated. 2 U.S.C. § 434(g)(1)(A); 11 C.F.R. § 109.10(d). Neither Beth Steele nor Women Advocating Respect filed a report with the Federal Election Commission disclosing the October 25, 2012 independent expenditure expressly advocating the defeat of Alan Grayson.

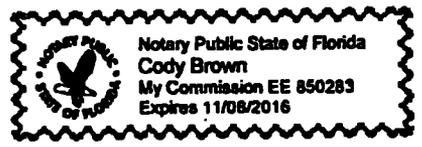
On information and belief, the Women Advocating Respect October 25, 2012 robocall cost well in excess of \$1,000. Accordingly, I hereby request that the Federal Election Commission initiate an investigation of Beth Steele and Women Advocating Respect for violating 2 U.S.C. § 434(c)&(g) and 11 C.F.R. § 109.10, impose appropriate sanctions and take any further action that may be appropriate.

Sincerely,

*Scott Randolph*

Scott Randolph  
Chairman  
Orange County Democratic Executive Committee

Signed and sworn before me on 2/8/13. *Cody Brown*  
Cody Brown



Political advertisement paid for and approved by Orange County Democratic Party.  
P.O. Box 1648, Orlando, FL 32802-1648





180444454640

1407457442001

**EXHIBIT B**



**SCHEDULE A (FEC Form 3)  
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER:	PAGE 18 OF 35
	(check only one)	
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b
<input type="checkbox"/> 14	<input type="checkbox"/> 15	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**LONG, WILLIAM TODD**

**A.** Full Name (Last, First, Middle Initial)  
**Mr. RONALD J. SKIPPER**

Mailing Address **3415 W.FOREST LAKE CIR.**

City **SARASOTA** State **FL** Zip Code **34232**

FEC ID number of contributing federal political committee. **C**

Name of Employer **FERGESON,SKIPPER,ET AL** Occupation **ATTORNEY**

Receipt For: 2012  
 Primary  General  
 Other (specify)

Election Cycle-to-Date **250.00**

Date of Receipt  
**09 / 05 / 2012**

Transaction ID : **SA11AL4197**

Amount of Each Receipt this Period  
**250.00**

GIFT

**B.** Full Name (Last, First, Middle Initial)  
**Mr. BARRY SMITH**

Mailing Address **561 LAKEHAVEN CIRCLE**

City **ORLANDO** State **FL** Zip Code **32828**

FEC ID number of contributing federal political committee. **C**

Name of Employer **MITSUBISHI POWER SYSTEMS AMERI** Occupation **PROJECT MGR.**

Receipt For: 2012  
 Primary  General  
 Other (specify)

Election Cycle-to-Date **238.75**

Date of Receipt  
**09 / 11 / 2012**

Transaction ID : **SA11AL4201**

Amount of Each Receipt this Period  
**238.75**

GIFT

**C.** Full Name (Last, First, Middle Initial)  
**Ms BETH STEELE**

Mailing Address **6220 S.OBT STE 511**

City **ORLANDO** State **FL** Zip Code **32809**

FEC ID number of contributing federal political committee. **C**

Name of Employer **TEAM STAFFING SERVICES** Occupation **OWNER**

Receipt For: 2012  
 Primary  General  
 Other (specify)

Election Cycle-to-Date **1553.41**

Date of Receipt  
**08 / 15 / 2012**

Transaction ID : **SA11AL4303**

Amount of Each Receipt this Period  
**1553.41**

In-kind -

**SUBTOTAL** of Receipts This Page (optional).....

**TOTAL** This Period (last page this line number only).....

**2042.16**

180844440041

**SCHEDULE A (FEC Form 3)  
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER:	PAGE 19 OF 35
	(check only one)	
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b
<input type="checkbox"/> 14	<input type="checkbox"/> 15	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**LONG, WILLIAM TODD**

**A.**

Full Name (Last, First, Middle Initial)  
**Ms BETH STEELE**

Mailing Address **6220 S.OBT  
SUITE 511**

City **ORLANDO** State **FL** Zip Code **32809**

FEC ID number of contributing federal political committee. **C**

Name of Employer **TEAM STAFFING SERVICES** Occupation **OWNER**

Receipt For: 2012  
 Primary  General  
 Other (specify)

Election Cycle-to-Date  
**485.64**

Date of Receipt  
**09 / 14 / 2012**

Transaction ID : **SA11AI.4305**

Amount of Each Receipt this Period  
**485.64**

In-kind -

**B.**

Full Name (Last, First, Middle Initial)  
**Ms BETH STEELE**

Mailing Address **6220 S.OBT  
STE 511**

City **ORLANDO** State **FL** Zip Code **32809**

FEC ID number of contributing federal political committee. **C**

Name of Employer **TEAM STAFFING SERVICES** Occupation **OWNER**

Receipt For: 2012  
 Primary  General  
 Other (specify)

Election Cycle-to-Date  
**1913.41**

Date of Receipt  
**09 / 22 / 2012**

Transaction ID : **SA11AI.4315**

Amount of Each Receipt this Period  
**360.00**

In-kind -

**C.**

Full Name (Last, First, Middle Initial)  
**Mr. ALAN TAYLOR**

Mailing Address **1224 SHELTER ROCK ROAD**

City **ORLANDO** State **FL** Zip Code **32835**

FEC ID number of contributing federal political committee. **C**

Name of Employer **ALAN B. TAYLOR&ASSOCIATES,PA** Occupation **ATTORNEY**

Receipt For: 2012  
 Primary  General  
 Other (specify)

Election Cycle-to-Date  
**238.75**

Date of Receipt  
**08 / 14 / 2012**

Transaction ID : **SA11AI.4137**

Amount of Each Receipt this Period  
**238.75**

GIFT

**SUBTOTAL** of Receipts This Page (optional).....

**TOTAL** This Period (last page this line number only).....

**1084.39**

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